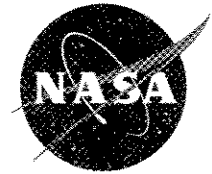


National Aeronautics and Space Administration
George C. Marshall Space Flight Center
Marshall Space Flight Center, AL 35812



September 14, 2009

Reply to Attn of: LS01 (AMM)

MEMORANDUM FOR RECORD

FROM: LS01/James R. Frees

SUBJECT: Approval for MSFC Employees with Senior Institutional and Senior Administrative Responsibilities to attend the 2009 Annual Outing sponsored by the Huntsville/Madison County Chamber of Commerce

In accordance with 5 C.F.R. 2635.204(g)(2) and (3), I make the following determination:

Certain MSFC employees with senior institutional or project responsibilities have been invited to attend the 2009 Annual Outing sponsored by the Huntsville/Madison County Chamber of Commerce (Chamber of Commerce) at Ditto Landing on September 22, 2009. The purpose of the event is to honor NASA and the Military.

The Chamber of Commerce is the lead economic development organization for Huntsville/Madison County, providing assistance for business expansion and recruitment, and delivering information regarding available sites, labor force, workforce development, taxation, finance programs and incentives. Members of the Chamber of Commerce include many NASA contractors and suppliers.

This event will be a widely-attended gathering of representatives of government, aerospace industry, small businesses, and community leaders. The reception is valued at \$20 per person and approximately 350 individuals have been invited to attend. The reception, which is fully funded by the Chamber of Commerce, will include a buffet. I find that the reception meets the requirements of a "widely attended gathering" as defined in 5 CFR §2635.204(g)(2).

Attendance of MSFC employees with senior institutional or project management responsibilities at this event would be in the best interest of NASA, since it will further NASA programs and operations. MSFC personnel invited to attend this event have, or may soon have, duties that involve frequent interaction with Chamber of Commerce and may substantially affect the Chamber's interests or the interest of a majority of the Chamber's members. Based on the invitation list provided, those personnel, identified by position, are: MSFC Center Director; Associate Center Director; Special Assistant to the Center Director; Director and Department Heads for the Office of Strategic Analysis & Communications as

listed herein: Supervisor, Business Planning and Integration Office; Supervisor, Public & Employee Communications Office; Supervisor, External Relations Office; Supervisor, Performance and Capabilities Management Office; and Supervisor, Engineering Cost Office.

These personnel are similarly situated in that they each have institutional responsibilities for MSFC that involve significant community relations responsibilities that could significantly influence Chamber programs and activities.

I have determined that attendance of these senior institutional and project leaders at the 2009 Annual Outing is in the interest of NASA because it will further agency programs and operations, help to raise NASA's profile with state and local business and governmental leaders, enhance community relations, and support NASA's statutory mandate to disseminate information about its programs.

Given the purpose of the event, NASA's interest in it, the broad attendance anticipated, and the modest market value of the event, I have determined that the value to the agency in having these senior institutional and project leaders attend this event outweighs any concern that free attendance may or may appear to improperly influence them in the performance of their duties.

Accordingly, NASA employees in the positions identified above may accept free attendance at the event. They may also accept invitations for accompanying spouses or guests. Free attendance by employees whose duties do not affect the Chamber's members is addressed in a separate determination.¹

Questions about this determination may be addressed to Annette Metcalf Coffel at 256-544-0025.


James R. Frees
Acting Chief Counsel

¹ The Huntsville/Madison County Chamber of Commerce is not a lobbying organization and is not registered as such under the Lobbying Disclosure Act.